

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IOENGINE, LLC, )  
Plaintiff, )  
v. ) C.A. No. 18-452 (WCB)  
PAYPAL HOLDINGS, INC., )  
Defendant. )

**STIPULATION AND [PROPOSED] ORDER STAYING ALL DEADLINES**

WHEREAS, on September 3, 2025 the Court stayed all deadlines through October 2, 2025 to allow the parties to finalize an agreement to resolve all matters in controversy;

WHEREAS, the parties have now reached a final agreement on settlement to resolve all matters in controversy; and

WHEREAS, the parties agree that an additional 15-day stay of all deadlines will preserve judicial and party resources and will allow the parties to execute the final agreement and prepare the appropriate dismissal papers;

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that all case deadlines are stayed through October 17, 2025.

SMITH, KATZENSTEIN & JENKINS LLP

*/s/ Neal C. Belgam*

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October 2, 2025

SO ORDERED this \_\_\_\_ day of October, 2025.

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Hon. William C. Bryson  
United States Circuit Judge